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February 23, 2022

By ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Pierre, et al., 22 Cr. 00019 (PGG)

Dear Judge Gardephe,

I am counsel for Defendant Arthur Bogoraz, and write to request a modification to the bail terms that were so ordered by the Court on February 7, at ECF 39 (“February 7 Order”), and extended by the Court on February 18, at ECF 43.

For similar reasons set forth in our first request for an extension, we are respectfully requesting another seven days to complete the filing of a confession of judgment in Bergen County, relating to the terms of release for Mr. Bogoraz.

As with our first request for an extension, we make this second request with the consent of the Government. Additionally, Pretrial Services Officer Josh Rothman advises that he takes no position.

By way of summary, the February 7 Order provided seven days for the defense to submit confessions of judgment relating to six properties that were pledged as part of the bail package. That deadline expired on February 17, and the Court, in response to our consent motion for more time, extended it to February 24. As we noted in our first request, we were able to submit filing receipts for five of the six properties, but we have yet to be successful in filing the final confession of judgment in Bergen County, due to what appears to be procedural issues with that jurisdiction. We are presently in discussions with the Government in an attempt to resolve this issue.

Accordingly, we respectfully request an additional seven days, on consent with the Government, to continue our efforts to effect the filing of the confession of judgment in Bergen County.

Respectfully submitted,

s/

Aaron M. Rubin

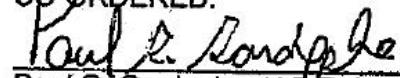
cc:

AUSA Mathew Andrews
AUSA Louis Pellegrino
Pretrial Services Officer Josh Rothman

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: February 24, 2022